

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ROGER E. HUGHES, JR., as Settlement Agent,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No. 04-11635-NG
	)	
MICHAEL G. & KENDRA B. GEORGES,	)	Judge Gorton
Individually and as Trustees of the	)	
Georges Realty Trust,	)	
KARA GEORGES HUNTINGTON,	)	
ERIK M. GEORGES,	)	
UNITED STATES OF AMERICA, and	)	
LYNNE F. RILEY, as Chapter 7 Trustee of	)	
the Bankruptcy Estate of Michael G. Georges,	)	
	)	
Defendants.	)	

ASSENTED-TO MOTION FOR ENLARGEMENT OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT

The United States of America moves for an enlargement of time within which it must serve its answer or other response to the Complaint For Interpleader, from September 27, 2004, to and including October 27, 2004.

The additional time is necessary because, on September 15, 2004, a stipulation and motion for entry of judgment was filed in a related bankruptcy adversary proceeding that is pending in the Bankruptcy Court for the District of Massachusetts (Adv. No. 02-1352 (USBC D. Mass.)), which may affect this case. The filed stipulation and motion in the bankruptcy adversary proceeding was executed by the plaintiff in this case, Roger Hughes as Settlement Agent ("the Plaintiff"), and by defendants Michael Georges, Kara Georges Huntington, Erik Georges, and the United States of America, and was submitted with a proposed judgment for that action. The stipulation provides for payment to the United States of all funds interpleaded in this

action and includes an agreement by Michael Georges to entry of judgment against him if the United States crossclaims in this case to reduce tax assessments to judgment. (A copy of the stipulation and motion filed in the bankruptcy adversary proceeding is attached hereto.)

The Bankruptcy Court has not yet ruled on the stipulation because it was abandoning certain property and the time for the Chapter 7 Trustee to object has not expired. Accordingly, the United States of America, with the assent of the Plaintiff, moves for additional time to answer or otherwise respond to the Complaint for Interpleader so that the Bankruptcy Court may have adequate time to rule on the pending motion for entry of judgment, and this Court and the parties hereto may be apprised of the consequences of the Bankruptcy Court's ruling.

The undersigned attorney for the United States of America further represents to the Court that on September 23, 2004 the Plaintiff stated that he assents to this motion.

MICHAEL J. SULLIVAN  
United States Attorney

/s/ Barry E. Reiferson  
BARRY E. REIFERSON  
Trial Attorney, Tax Division  
United States Department of Justice  
P.O. Box 55, Ben Franklin Station  
Washington, D.C. 20044-0055  
Tel.: (202) 514-6058

I hereby certify that a true copy of the above document was served on this 27th day of September, 2004, by first class mail, postage prepaid, and properly addressed, to plaintiff Roger Hughes as Settlement Agent..

/s/ Barry E. Reiferson  
BARRY E. REIFERSON